

# **EXHIBIT Q**

**IN THE SUPERIOR COURT OF DECATUR COUNTY**

**STATE OF GEORGIA**

*Cecilia Willis*  
 Cecilia Willis, Clerk  
 Decatur County, Georgia

STATE OF GEORGIA,	)	CIVIL ACTION FILE
	)	NO. 23CV00260
Plaintiff,	)	
	)	
v.	)	
	)	
DECATUR COUNTY-BAINBRIDGE	)	
INDUSTRIAL DEVELOPMENT AUTHORITY	)	
	)	
and	)	
	)	
SAFER HUMAN MEDICINE, INC.,	)	
	)	
Defendants.	)	
	)	

**RESPONSE  
 TO  
 MOTION FOR RECONSIDERATION  
 OR  
 IN THE ALTERNATIVE TO  
SET ASIDE THE VALIDATION ORDER**

Defendant Decatur County-Bainbridge Industrial Development Authority (“Defendant Authority”), by and through its undersigned counsel and at Defendant Authority’s direction, hereby responds to Plaintiff’s Motion For Reconsideration Or In The Alternative To Set Aside The Validation Order (“Plaintiff’s Motion”), and respectfully shows this Court as follows:

Defendant Authority objects to the factual assertions and legal conclusions contained in Plaintiff’s Motion, and respectfully requests the Court ignore the same in reaching any resolution of Plaintiff’s Motion, any other filings before, or that may (or may have already) come before, the Court in this matter, and to ignore the same in the consideration of any future matters in which Defendant Authority, or its counsel, may appear before this Court.

On February 2, 2024, Defendant Authority voted (a) to revoke its approval of the Bond Resolution, which Defendant Authority had adopted on December 11, 2023 (including all related documents), (b) to consent to the rescission of the Court's Bond Validation Order, dated January 2, 2024, (c) to consent to the withdrawal of all answers and acknowledgments and other pleadings in this matter, (d) to consent to the rescission of the District Attorney's Petition and Complaint, filed December 14, 2023, (e) to consent to the dismissal of this action, including all pleadings, motions, notices, etc., (f) to consent to the rescission of Defendant Authority's Notice to the District Attorney, dated December 11, 2023, and (g) to direct the undersigned counsel to file this Response, all with out prejudice to the parties in this action.

Defendant Authority reserves any right to provide an additional response to the Court at a hearing, if any, of this matter.

## **CONCLUSION**

Having provided an initial response to Plaintiff's Motion, Defendant Authority respectfully requests this Court:

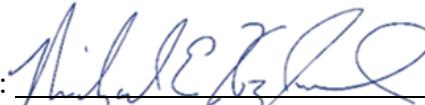
- (a) dispose of Plaintiff's Motion on the papers, with out a hearing,
- (b) rescind the Court's Bond Validation Order, dated January 2, 2024,
- (c) rescind the filing of all answers and acknowledgments and other pleadings in this matter,
- (d) rescind the filing of the District Attorney's Petition and Complaint, filed December 14, 2023,
- (e) dismiss this action, including all pleadings, motions, notices, etc.,
- (f) acknowledge the rescission of Defendant Authority's Notice to the District Attorney, dated December 11, 2023,

(g) acknowledge the rescission of Defendant Authority's approval of the Bond Resolution, which Defendant Authority had adopted on December 11, 2023 (including all related documents),

(h) order each party to bear its own costs and fees, and

(i) grant such other and further relief, consistent with the relief above requested, as the Court may deem just and proper, all with out prejudice to the parties in this action.

Respectfully submitted, February 2, 2024.

By:   
Michael E. Kozlarek  
Counsel for Decatur County-Bainbridge  
Industrial Development Authority

Address: King Kozlarek Root Law LLC  
223 North Donalson Street  
Suite 36  
Bainbridge, Georgia 39817

Telephone: 229.726.0127

State Bar No.: 141591